

BALL, BALL, MATTHEWS & NOVAK, P.A.

ATTORNEYS AT LAW

EST. 1891

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April 2, 2007

Hon. Arlene M. Richardson
Richardson Legal Center, LLC
Post Office Box 971
Hayneville, AL 36040-0971

VIA EMAIL

RE: *R.A. v. Walter Lacey*

In the United States District Court for the Middle District of Alabama
3:06-cv-337-WHA

Dear Arlene:

As per our telephone conversation of April 3, 2007, I understand that you will advise me if you intend to call any of the plaintiff's witness who have not previously been deposed in this matter so that I can schedule their deposition in the near future.

Also, I understand that you have no other medical records and that you have no objection to the subpoenas which I have issued to the plaintiff's healthcare providers, including the subpoena to East Alabama Medical Center issued today.

Finally, I understand that you will incorporate the Defendant's Contentions in the proposed Pretrial Order, to be filed today with Judge Albritton and that you will reflect that item 3(b) under pleadings is the Amended Answer to Complaint.

If there are any problems or questions with the above, please do not hesitate to contact me.

Sincerely yours,

C. Winston Sheehan, Jr.

CWSjr/rps



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April 10, 2007

Hon. Arlene M. Richardson
Richardson Legal Center, LLC
Post Office Box 971
Hayneville, AL 36040-0971

VIA EMAIL

C

RE: *R.A. v. Walter Lacey*

In the United States District Court for the Middle District of Alabama
3:06-cv-337-WHA

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Dear Arlene:

P

Please find attached a revised version of the Order on Pretrial Hearing, which you forwarded to me on April 5, 2007. If agreeable with you, please forward it to the court.

Y

As I have previously requested, I would like to depose any witness you intend to call at trial who has not been previously deposed.

Would you please let me know as soon as possible if you intend to call anyone who has not previously been deposed?

Thank you for your assistance and cooperation in this matter.

Sincerely yours,

C. Winston Sheehan, Jr.

CWSjr/rps



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April 12, 2007

Hon. Arlene M. Richardson
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VIA EMAIL

C

RE: *R.A. v. Walter Lacey*

In the United States District Court for the Middle District of Alabama
3:06-cv-337-WHA

O

Dear Arlene:

P

Pursuant to your representation to Judge Albritton that you may call Quindarrius Johnson as a witness, I would again renew my request to depose any and all witnesses whom you may use at trial.

Y

Would you please let me know as soon as possible whether you intend to call any witnesses, who have not been previously deposed so that I can schedule their depositions in the near future?

Thank you for your assistance and cooperation in this matter.

Sincerely yours,

C. Winston Sheehan, Jr.

CWSjr/rps

